

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)	
Gloria Lynn Broyles,)	Case No: 24-40877
Debtor/ Movant,)	
)	
vs.)	Chapter13
)	
Diana S. Daugherty)	Hearing Date: 10/24/2024
Chapter 13 Trustee/Respondent.)	Hearing Time: 11:00 a.m.
)	Hearing Location: 7 North

**NOTICE OF HEARING AND MOTION TO APPROVE OR CONFIRM
AN AMENDED CHAPTER 13 PLAN POST CONFIRMATION**

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY 10/17/24.

YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING. REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW, Debtor by and through Debtor's undersigned Counsel and states as follows:

1. Debtor's Chapter 13 Plan was confirmed on 05/17/2024.
2. The Third amended plan proposes to provide a guarantee of 100% to be paid to non-priority unsecured creditors under paragraph 3.9(a).

WHEREFORE, Debtor prays this honorable Court enters an order granting Debtor's Motion to Amend Confirmed Plan.

RESPECTFULLY SUBMITTED,

Law Offices of Tobias Licker, LLC

/s/Tobias Licker

Attorney for Debtor, #56778 MO,

1861 Sherman Drive

St. Charles, MO 63303

Tel.: (636)916-5400

Fax: (636)916-5402

Email: Tobias@lickerlawfirm.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the **Motion to Amend Plan** was filed electronically on 9/21/2024, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the **Motion to Amend Plan** was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully prepaid, addressed to those parties listed on the Court's Manual Notice List and listed below on 9/21/2024.

/s/ Saloni Mehta

Diana S. Daugherty
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Office of the US Trustee
111 S Tenth St, Ste 6.353
St. Louis, MO 63102-1127